

UNITED STATES DISTRICT COURT for the

\_\_\_\_\_ District of \_\_\_\_\_

\_\_\_\_\_ Division

United States Courts  
Southern District of Texas  
FILED

MAR 12 2020

David J. Bradley, Clerk of Court

Ziaunnisa K. Lodhi

)

Case No. \_\_\_\_\_

Plaintiff

)

v.

)

Shah A. Haque

)

&

)

Farhana Haque

)

Jury Trial: Yes

Defendants

)

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**COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE, BATTERY, ASSAULT and THEFT**

**TO THE HONORABLE UNITED STATES DISTRICT JUDGE:**

(28 U.S.C. § 1332; Diversity of Citizenship)

**I. The Parties to This Complaint:**

**A. The Plaintiff lives in New York State:**

P. O. Box 550 Rensselaer NY 12144

Phone: 518 331 9443

Email: [Neeshakhan2006@hotmail.com](mailto:Neeshakhan2006@hotmail.com)

**B. The Defendants live in Texas and Maryland:**

**1. Shah A. Haque**

7419 Grand Terrace Ct Houston TX 77095

Phone No: 832 495 6890

Email: [haque05@msn.com](mailto:haque05@msn.com)

**2. Farhana Haque**

9268 Christo Court Owings Mills, MD 21117-0000

Email: [Haq2@hotmail.com](mailto:Haq2@hotmail.com), [farhanahaque2952@aol.com](mailto:farhanahaque2952@aol.com)

## **II: Basis for Jurisdiction**

This Court has jurisdiction under 28 U.S.C 1332, the parties have complete diversity and the amount in controversy is \$500,000. Therefore, this court has jurisdiction.

### **A: Citizenship of Parties and Amount in Controversy**

The plaintiff is domiciled in New York and defendants are from Texas and Maryland. Thus, complete diversity. This civil claim is for \$500,000. Therefore, this court has jurisdiction.

### **III: Statement of Claim: Places of Occurrence: San Antonio and Houston Texas**

#### **Facts:**

I: The plaintiff, Lodhi, was in possession of a 2009 Volkswagen, which had all of her belongings inside. It was parked in an HEB parking lot located on Florence Street, San Antonio, TX near the Bexar County Courthouse. She was attending a court hearing on March 29, 2018. Defendant, Farhana Haque, took the car with all items, handbag, phone, IDs, cash, jewelry and more. Defendants, Shah and Farhana Haque, drove the car to their house located at 7419 Grand Terrace Ct. Houston, Harris County, Texas. Plaintiff immediately filed a police report in San Antonio, Bexar County.

II: On March 30, 2018, plaintiff went to defendant Shah Haque's house to retrieve her property. Defendant Shah Haque opened the door and once plaintiff Lodhi asked for her personal items, defendant Shah Haque and defendant Farhana Haque started hitting her and shouted at her to leave the property. Defendant Farhana Haque called 911, and plaintiff Lodhi also called 911.

Later, before the Houston police arrived, both defendants hid plaintiff's personal belongings in defendant Shah Haque's car.

III: Plaintiff Lodhi suffered physical injuries, emotional distress and incurred medical expenses.

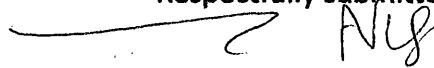
IV: Defendant Shah Haque is the ex-spouse of plaintiff Lodhi. He assaulted and caused several injuries to plaintiff Lodhi when she arrived at his home to recover her property.

V: Defendant Shah Haque sent several defamatory text messages, emails and letters to plaintiff and her family and friends.

#### **Conclusion and Prayer**

Plaintiff Lodhi requests that Defendants be cited to appear and answer this Complaint; that upon final trial, the Plaintiff be awarded a judgment against the Defendants for actual damages for \$500,000. The plaintiff Lodhi's pain and suffering to be determined by the jury and for such other amounts as she shall show by proper amendment before trial; for post-judgment interest at the applicable legal rate; for all court costs incurred in this litigation; and for such other relief, at law and in equity, both general and special, to which Plaintiffs may show herself entitled to and to which the Court believe she deserves.

Respectfully submitted,



Ziaunnisa Lodhi *Pro Se*

P. O. Box 550 Rensselaer NY12144

Neeshakhan2006@hotmail.com